

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ST. JUDE MEDICAL, CARDIOLOGY
DIVISION, INC., ST. JUDE MEDICAL
SYSTEMS AB, and ST. JUDE MEDICAL
S.C., INC.,

Plaintiffs and
Counterclaim Defendants,

v.

VOLCANO CORPORATION,

Defendant and
Counterclaimant.

C. A. No. 10-00631-RGA-MPT

JURY TRIAL DEMANDED

**CROSS-MOTION TO STRIKE EXPERT REPORTS
OF ST. JUDE'S INEQUITABLE CONDUCT EXPERTS**

Defendant and counterclaimant Volcano Corporation ("Volcano") by and through their undersigned attorneys, hereby move this Court for an order in the form attached hereto striking the expert report and related testimony of Plaintiffs St. Jude Medical, Cardiology Division, Inc., St. Jude Medical Systems AB, and St. Jude Medical S.C., Inc.'s ("St. Jude") inequitable conduct experts John Love, Anthony Mason and Khalil Najafi, as inadmissible under Fed. R. Evid. 702. The grounds for this motion are set forth in Volcano Corporation's Brief in Opposition to Plaintiffs' Motion to Strike the Expert Report of Volcano's "Patent Law Expert" and Cross-Motion to Strike Expert Reports of St. Jude's Inequitable Conduct Experts, filed contemporaneously herewith.

Dated: May 7, 2012

FISH & RICHARDSON P.C.

By: /s/ Thomas Lee Halkowski

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